

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:
Jonathon Robert Smith,
Debtor

Pennymac Loan Services, LLC,
Movant

v.

Jonathon Robert Smith,
Respondent

Jack N. Zaharopoulos,
Trustee

Chapter 13

CASE NO 1:25-bk-00497-HWV

ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY

AND NOW, comes the above-captioned Debtor, Hans Christian Kirna, by and through his attorney, Dawn Cutaia, who files this Answer:

1. Admitted.
2. Admitted.
3. Admitted.
4. The documents speak for themselves and therefore this allegation is denied and strict proof demanded at trial.
5. Admitted.
6. Denied.
7. Admitted but any arrears can be cured through an amended plan.
8. Denied.
9. Denied.
10. Denied.

WHEREFORE, Debtor respectfully requests this Honorable Court deny the Motion for Relief from Stay and allow Debtor to cure any arrears with an amended plan.

Respectfully Submitted

/s/ Dawn Marie Cutaia

Attorney for Debtor

Supreme Court ID: 77965

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